

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

NADAJALIETTE MONTALVO,)

Plaintiff,)

v.)

Civil Action No. 3:24-cv-303

WORLDWIDE FLIGHT SERVICES)

INC. and IAS LOGISTICS DFW, LLC)

d/b/a PINNACLE LOGISTICS)

Defendants.)

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

COME NOW Defendants Worldwide Flight Services, Inc., and IAS Logistics DFW, LLC, d/b/a Pinnacle Logistics ("Defendants"), by and through their undersigned counsel, and move the Court for an extension of time until April 19, 2024, to answer or otherwise respond to the Plaintiff's Original Complaint ("Complaint") filed by Plaintiff Nadajaliette Montalvo ("Plaintiff"). In support of this unopposed motion, Defendants state as follows:

1. Plaintiff's Complaint was filed on February 7, 2024.
2. Defendants were served with a summons and Plaintiff's Complaint on or about February 8, 2024.
3. On March 1, 2024, Defendants were granted an extension of time until March 29, 2024, to file their answer or other responsive pleading. The current deadline for Defendants to file their answer or other responsive pleading is March 29, 2024.
4. The parties are actively engaged in settlement negotiations. Defendants request additional time to complete settlement negotiations to possibly avoid incurring the time and expense of answering Plaintiff's Complaint and beginning pretrial activities. Thus, Defendants

request additional time until April 19, 2024 to complete settlement negotiations and to answer or otherwise respond to Plaintiff's Complaint.

5. This Motion is not made for the purpose of delaying the adjudication of this case or for any other improper purpose but is made in good faith. Plaintiff will suffer no prejudice if the Court grants this Motion.

WHEREFORE, Defendants respectfully request that the Court grant an extension of time until April 19, 2024, to answer or otherwise respond to Plaintiff's Complaint. A proposed Order is attached hereto.

Respectfully submitted March 27, 2024.

**CONSTANGY, BROOKS, SMITH &
PROPHETE, LLP**

/s/ Hunter Johnson

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned counsel for Defendants has conferred with counsel for Plaintiff, Travis Gasper, and counsel for Plaintiff does not oppose the extension requested in this Motion.

/s/ Hunter Johnson

CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2024, a true and correct copy of the above and foregoing DEFENDANTS WORLDWIDE FLIGHT SERVICES, INC. and IAS LOGISTICS DFW, LLC, d/b/a PINNACLE LOGISTICS UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT was served via the Court's electronic case filing system, on the following:

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ATTORNEY FOR PLAINTIFF

/s/ Hunter Johnson
Attorney for Defendants